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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 DIAMOND RESORTS U.S. COLLECTION
14 DEVELOPMENT, LLC, a Delaware limited
liability company,

15 Plaintiff,
vs.

16 REED HEIN & ASSOCIATES, LLC d/b/a/
17 TIMESHARE EXIT TEAM, a Washington
limited liability company; BRANDON REED,
an individual and citizen of the State of
Washington; TREVOR HEIN, an individual
and citizen of Canada; THOMAS
18 PARENTEAU, an individual and citizen of the
State of Washington; HAPPY HOUR MEDIA
GROUP, LLC, a Washington limited liability
company; MITCHELL R. SUSSMAN &
ASSOCIATES, an individual and citizen of
the State of California; SCHROETER,
GOLDMARK & BENDER, P.S., a
21 Washington professional services
corporation; and KEN B. PRIVETT, ESQ., a
citizen of the State of Oklahoma,

22 Defendants.

23 CASE NO.: 2:17-cv-03007-APG-VCF

24 **STIPULATION AND ORDER TO
EXTEND TIME TO FILE RESPONSE
TO MOTION FOR PROTECTIVE
ORDER REGARDING SCHROETER,
GOLDMARK & BENDER, P.S.'S FRCP
30(B)(6) DEPOSITION NOTICE TO
PLAINTIFF [ECF NO. 404]**

25 **(First Request)**

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1 **STIPULATION AND ORDER TO EXTEND TIME TO FILE RESPONSE TO MOTION**
2 **FOR PROTECTIVE ORDER REGARDING SCHROETER, GOLDMARK & BENDER,**
3 **P.S.'S FRCP 30(B)(6) DEPOSITION NOTICE TO PLAINTIFF [ECF No. 404]**
4 **(First Request)**

5 Pursuant to Local Rule 7-1, Plaintiff DIAMOND RESORTS U.S. COLLECTION
6 DEVELOPMENT, LLC ("Plaintiff") and Defendant SCHROETER, GOLDMARK &
7 BENDER, P.S. ("SGB"), by and through their respective counsel, agree and stipulate as
follows:

8 1. On March 4, 2021, Plaintiff filed Motion for Protective Order Regarding
9 Schroeter, Goldmark & Bender, P.S.'s FRCP 30(b)(6) Deposition Notice to Plaintiff
10 [ECF 404] ("Motion");

11 2. The deadline for SGB to respond to Plaintiff's Motion is March 18, 2021.

12 3. The Parties agree that SGB will need additional period of time to review
13 Plaintiff's lengthy Motion along with the exhibits presented therein.

14 4. The Parties therefore agree and stipulate that the deadline for SGB to file
15 its response to Plaintiff's Motion, ECF No. 404, shall be extended for two weeks, up to
16 and including **Thursday, April 1, 2021**.

17 5. Pursuant to Local Rule 6-1(b), the Parties state the reason for the
18 extension is to provide additional time to SGB's counsel to adequately respond to the
19 issues raised in Plaintiff's Motion.

20 6. The Parties have entered into this agreement in good faith and not for
21 purposes of delay. This is the Parties' first stipulation for extension of this deadline.
22 This request will not cause any prejudice to the parties in this matter.

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*Diamond Resorts U.S. Collection Development, LLC v.
Reed Hein & Associates, LLC, et al.
Case No. 2:17-cv-03007-APG-VCF*

Dated this 12th day of March, 2021.

Dated this 12th day of March, 2021.

GREENSPOON MARDER LLP

LIPSON NEILSON P.C.

/s/ Phillip A. Silvestri

/s/ Megan H. Thongkham

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IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

3-12-2021

DATED: _____